

Message

From: Langman, Michael [langman.michael@epa.gov]
Sent: 4/17/2018 6:57:58 PM
To: Williams, Brian (bwilliam@idem.IN.gov) [bwilliam@idem.IN.gov]
CC: Danesh, Paymon [Danesh.Paymon@epa.gov]
Subject: RE: Riverview Energy
Attachments: Module5 - Syngas Cleanup.pdf; Module6 - Fischer-Tropsch and Product Upgrade.pdf; Introduction.pdf; Module2 - Feedstock Processing.pdf

Hi Brian,

For the permit you cited below, Ohio EPA's staff determination (similar to IDEM's TSD) can be found with the draft PTI. The draft PTI can be found at http://www.wapp.epa.ohio.gov/dapc/permits_issued/197424.pdf. Unfortunately, it does not look like there is any discussion about the applicability of the various NSPS requirements included in the permit (for example, on pdf page 216/permit page 188). However, the general discussion in the staff determination may be helpful.

The final PTI with responses to comments can be found at http://www.wapp.epa.ohio.gov/dapc/permits_issued/221260.pdf. It does not look like there are any comments regarding the refinery NSPS, likely because Ohio EPA included the requirements in the permit. The final permit may be less helpful, but I'm including it just in case. Ohio's response to comment 16 on pdf page 7 appears to refer to the facility as a refinery.

I was able to find the application for this PTI. Unfortunately, the application does not appear to be available online. I've attached relevant portions of the application, mainly due to file size limitations. Please let me know if the 4 attached pdf documents were removed from this email and I can resend them.

The application's introduction explains the different modules and provides a brief overview of the process. Module 2 is for the feedstock processing portion of the facility and discusses the applicability of NSPS Subpart Ja (pdf page 9) to fuel gas combustion devices. Module 5 relates to the syngas cleanup portion of the project (i.e., sulfur recovery units) and discusses the applicability of 40 CFR 60 Subpart Ja and 40 CFR Part 63 Subparts CC and UUU (pdf pages 10-14). Module 6 refers to the product upgrade portion of the process, which the applicant says is similar to petroleum refining, and discusses the applicability of 40 CFR 60 subparts Ja and GGGa and 40 CFR 63 subparts CC (pdf pages 8-12).

We'll continue looking into whether this facility should be considered a petroleum refinery for the purpose of refinery NSPS applicability. Any information we're able to find and share should be able to help you make a determination on the application or, at the very least, provide information to help with a formal applicability determination if that's ultimately determined to be necessary.

Please let me know if you have any questions or wish to discuss this further.

Thanks,
 Michael Langman
 Environmental Scientist
 Air Permits Section, US EPA Region 5
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 Phone: 312-886-6867

From: Williams, Brian [mailto:BWilliam@idem.IN.gov]
Sent: Monday, April 16, 2018 10:40 AM
To: Langman, Michael <langman.michael@epa.gov>
Subject: Riverview Energy

Mike,

In reference to our discussion in the monthly call here is the information IDEM has. The source's name is Ohio River Clean Fuels LLC. Here is the link to what we have found from Ohio EPA's website:

<http://www.epa.ohio.gov/portals/27/transfer/ptiApplication/orcf/OhioCleanRiverFuelsPTI.pdf>

Sincerely,
Brian Williams
Section Chief
Permits Branch, Office of Air Quality
Indiana Department of Environmental Management
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